

Approved:

Samuel P. Rothschild

SAMUEL P. ROTHSCHILD
MITZI S. STEINER
Assistant United States Attorneys

Before: THE HONORABLE STEWART D. AARON
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA :
: SEALED COMPLAINT
: - v. - : Violation of
: : 21 U.S.C. § 846
PABLO JARAMILLO, :
: Defendant. : COUNTY OF OFFENSE:
: : NEW YORK
----- x

SOUTHERN DISTRICT OF NEW YORK, ss.:

CHRISTIAN GARCIA, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration (the "DEA"), and charges as follows:

COUNT ONE
(Narcotics Conspiracy)

1. In or about June 2021, in the Southern District of New York and elsewhere, PABLO JARAMILLO, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that PABLO JARAMILLO, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that PABLO JARAMILLO, the defendant, conspired to distribute and to possess with intent to distribute was five kilograms and more of mixtures and substances

containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b) (1) (A).

(Title 21, United States Code, Section 846.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

4. I am a Special Agent with the DEA, and I have been personally involved in this investigation. This affidavit is based on my investigation, my conversations with other law enforcement officers and other individuals, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Based on my training and experience, my participation in this investigation, including my personal observations, my conversations with confidential sources working at the direction of law enforcement ("CS-1"¹ and "CS-2,"² and, collectively, the "CSes"), my review of materials provided by the CSes, including consensually created recordings of at least some of the communications described below,³ my conversations with other

¹ CS-1 has been providing information to the DEA since on or about June 14, 2021. CS-1 has been charged with a federal narcotics offense and is providing information to law enforcement in the hopes of receiving leniency with respect to that charge. Information provided by CS-1 has been found reliable, credible, and corroborated by, among other things, consensually created recordings as discussed below.

² CS-2 has been providing information to the DEA since on or about June 17, 2021. CS-2 has been arrested on a federal narcotics offense and is providing information to law enforcement in the hopes of receiving leniency with respect to that charge. Information provided by CS-2 has been found reliable, credible, and corroborated by, among other things, consensually created recordings.

³ The communications described below were predominantly in Spanish, which the CSes and I speak fluently.

i. CS-1 paid JARAMILLO approximately \$3,000 for introducing CS-1 to CC-1, and CS-1 kept a record of that payment in CS-1's cellphone.

j. Since CS-1's arrest, CS-1 has, at the direction of law enforcement, communicated with JARAMILLO via the Phone Number. CS-1 recorded those communications. During one such communication, on or about June 16, 2021, JARAMILLO told CS-1, in substance and in part, that JARAMILLO was looking for an approximately one kilogram "sample" of cocaine to provide to an individual who would break up that kilogram to give out samples to customers, and then, if satisfied, purchase an additional approximately six kilograms from JARAMILLO.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of PABLO JARAMILLO, the defendant, and that he be arrested and imprisoned or bailed, as the case may be.



CHRISTIAN GARCIA
Special Agent
DEA

Sworn to before me this
24th day of June, 2021.



THE HONORABLE STEWART D. AARON
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK